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**UNITED STATES DISTRICT COURT**

**DISTRICT OF OREGON**

**EUGENE DIVISION**

**JEFFERSON LOA, M.D.**, an individual,

Case No. 6:22-cv-01777-AA

Plaintiff,

v.

**JOINT MOTION TO EXTEND  
DISCOVERY AND PRE-TRIAL  
DEADLINES**

**SALEM HEALTH HOSPITALS &  
CLINICS**, an Oregon nonprofit  
corporation, and **SALEM HEALTH**, an  
Oregon nonprofit corporation,

Defendants.

**CERTIFICATE PURSUANT TO LR 7-1**

Pursuant to Local Rule 7-1, counsel for the Parties have conferred regarding the  
subject of this motion and jointly agree to it.

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**MOTION****GOOD CAUSE WHY DEADLINES SHOULD BE MODIFIED**

The Parties have conferred and respectfully jointly move this Court for an order modifying pre-trial deadlines as set forth below to allow the parties to complete discovery and proceed with dispositive motions.

**EFFECTIVE USE OF PRIOR TIME**

On both November 4, 2022, and November 8, 2023, the Parties participated in two different mediations, first with Judge Maurer, and then with Judge Rasmussen. Judge Rasmussen has continued to work with the Parties. Counsel have conferred and acknowledge that if the case is not resolved, they will need to extend the current deadlines in this case. Therefore, counsel propose the following extended deadlines.

**PROPOSED EXTENDED DEADLINES**

<b>Description of Deadline</b>	<b>Date</b>
Completion of fact discovery	Wednesday, July 31, 2024
Expert disclosures due	60 days after ruling on dispositive motions
File all dispositive motions	Wednesday, October 30, 2024
ADR deadline	30 days after ruling on dispositive motions
Counter designations of experts	30 days after ruling on dispositive motions

**IMPACT OF PROPOSED EXTENSION ON EXISTING DEADLINES**

This motion is not made for the purposes of delay and is the result of the parties continuing efforts to resolve the case. If the case continues and is not resolved on summary judgment, or resolved by the ADR deadline, then the parties will ask the Court to set a pre-trial conference to set trial dates and additional deadlines.

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### CONCLUSION

WHEREFORE, the Parties respectfully request that this Court grant their Joint Motion to Extend Discovery and Pre-Trial Deadlines Pursuant to Local Rule 16-3 and enter an order modifying the deadlines as set forth above.

DATED: January 8, 2024.

HAGLUND KELLEY LLP

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### CERTIFICATE OF SERVICE

I hereby certify that on February 2, 2023, I served the foregoing **JOINT MOTION TO EXTEND DISCOVERY AND PRE-TRIAL DEADLINES** on:

Christopher Lundberg  
Matthew E. Malmsheimer  
Haglund Kelley LLP  
2177 S.W. Broadway  
Portland, OR 97201

- ☒ by **electronic** means through the Court's Case Management/Electronic Case File system, which will send automatic notification of filing to each person listed above.
- ☐ by **mailing** a true and correct copy to the last known address of each person listed. It was contained in a sealed envelope, with postage paid, addressed as stated above, and deposited with the U.S. Postal Service in Portland, Oregon.
- ☐ by causing a true and correct copy to be **hand-delivered** to the last known address of each person listed. It was contained in a sealed envelope and addressed as stated above.
- ☐ by causing a true and correct copy to be delivered **via overnight courier** to the last known address of each person listed. It was contained in a sealed envelope, with courier fees paid, and addressed as stated above.
- ☐ by **faxing** a true and correct copy to the last known facsimile number of each person listed, with confirmation of delivery. It was addressed as stated above.
- ☐ by **emailing** a true and correct copy to the last known email address of each person listed, with confirmation of delivery.

s/Maryann Yelnosky

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